

1 RUDY Y. KIM (CA SBN 199426)  
RudyKim@mofo.com  
2 ALAN COPE JOHNSTON (CA SBN 66334)  
ACJohnston@mofo.com  
3 MORRISON & FOERSTER LLP  
755 Page Mill Road  
4 Palo Alto, California 94304  
Telephone: (650) 813-5600  
5 Facsimile: (650) 494-0792

6 ALEXANDER J. HADJIS (pro hac vice)  
AHadjis@mofo.com  
7 JOSHUA A. HARTMAN (pro hac vice)  
JHartman@mofo.com  
8 MORRISON & FOERSTER LLP  
2000 Pennsylvania Avenue, NW  
9 Suite 6000  
Washington, DC 20006  
10 Telephone: (202) 887-1500  
Facsimile: (202) 887-0763

11 Attorneys for Defendant-Counterclaimant  
12 FREESCALE SEMICONDUCTOR, INC.

13  
14 **UNITED STATES DISTRICT COURT**  
15 **NORTHERN DISTRICT OF CALIFORNIA**  
16 **OAKLAND DIVISION**  
17

18 MEDIATEK INC.,

19 Plaintiff,

20 v.

21 FREESCALE SEMICONDUCTOR, INC.,

22 Defendant.  
23  
24  
25  
26  
27  
28

Civil Action No. 4:11-cv-05341 (YGR)

**JOINT STIPULATION TO  
FREESCALE SEMICONDUCTOR,  
INC.'S ADMINISTRATIVE MOTION  
TO FILE DOCUMENTS UNDER  
SEAL**

1 Defendant Freescale Semiconductor, Inc. (Freescale) and Plaintiff MediaTek Inc.  
2 (MediaTek), through their undersigned counsel, hereby agree and stipulate as follows:

3 WHEREAS Freescale wishes to file an Administrative Motion to File Documents Under  
4 Seal in order to file under seal the corrected Freescale's Motion to Exclude the Testimony of  
5 Catharine M. Lawton (Motion), attached to Errata for Freescale's Motion;

6 WHEREAS the corrected Motion contains information designated by Freescale and by  
7 MediaTek as "Highly Confidential – Attorneys' Eyes Only" pursuant to the Stipulated Amended  
8 Protective Order in force in this action;

9 WHEREAS the parties met and conferred on this issue on December 5, 2013;

10 WHEREAS Freescale and MediaTek wish to maintain the confidentiality of certain  
11 information disclosed in the corrected Motion;

12 NOW THEREFORE, pursuant to Local Civil Rule 7-11, Freescale and MediaTek, by and  
13 through their respective counsel of record, HEREBY STIPULATE AS FOLLOWS:

14 The corrected Motion should be filed under seal.

15 IT IS SO STIPULATED.

16 Dated: December 5, 2013

FREESCALE SEMICONDUCTOR, INC.

17 By its attorneys,

18 /s/ Rudy Y. Kim

19 RUDY Y. KIM (CA SBN 199426)

20 RudyKim@mofo.com

21 ALAN COPE JOHNSTON (CA SBN 66334)

22 ACJohnston@mofo.com

23 MORRISON & FOERSTER LLP

24 755 Page Mill Road

25 Palo Alto, California 94304

26 Telephone: (650) 813-5600

27 Facsimile: (650) 494-0792

28 ALEXANDER J. HADJIS (*pro hac vice*)

AHadjis@mofo.com

JOSHUA A. HARTMAN (*pro hac vice*)

JHartman@mofo.com

MORRISON & FOERSTER LLP

2000 Pennsylvania Avenue, NW

Suite 6000

Washington, DC 20006

Telephone: (202) 887-1500  
Facsimile: (202) 887-0763

Dated: December 5, 2013

Respectfully submitted,

MEDIATEK INC.

By its attorneys,

/s/ Christopher A. Franklin

Keith L. Slenkovich (SBN 129793)

Keith.Slenkovich@wilmerhale.com

Joseph F. Haag (SBN 248749)

Joseph.Haag@wilmerhale.com

Christopher A. Franklin (SBN 272587)

Christopher.Franklin@wilmerhale.com

WILMER CUTLER PICKERING

HALE AND DORR LLP

950 Page Mill Road

Palo Alto, CA 94304

Telephone: (650) 858-6000

Facsimile: (650) 858-6100

William F. Lee (pro hac vice)

William.Lee@wilmerhale.com

WILMER CUTLER PICKERING

HALE AND DORR LLP

60 State Street

Boston, MA 02109

Telephone: (617) 526-6000

Facsimile: (617) 526-5000

James M. Dowd (SBN 259578)

James.Dowd@wilmerhale.com

WILMER CUTLER PICKERING

HALE AND DORR LLP

350 S. Grand Avenue, Suite 2100

Los Angeles, CA 90071

Telephone: (213) 443-5300

Facsimile: (213) 443-5400